

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.: 5:23CR0500
Plaintiff,	)	JUDGE CHARLES ESQUE FLEMING
v.	)	)
NATHANIEL L. STURDIVANT,	)	)
MOHAMED SALIM MOHAMED,	)	)
LARRY D. REYNOLDS,	)	)
JAYLAND C. WARE,	)	)
LORENZO L. NETTLES,	)	<u>GOVERNMENT'S RESPONSE TO</u>
DASHAWN E. DUMAS,	)	<u>DEFENDANTS' REQUEST FOR</u>
MARCUS T. WINN,	)	<u>DISCOVERY</u>
Defendants.	)	)

Now comes the United States of America, by and through attorneys, Rebecca C. Lutzko, United States Attorney, and Joseph P. Dangelo, Assistant U. S. Attorney, and pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby provides notice of discovery and responds to defendant's request for discovery.

Discovery was delivered via FedEx via USB flash drive September 27, 2023.

**I. Discovery and Inspection**

The United States will permit the defendant to inspect and copy or photograph:

**A. Statements of the defendant to law enforcement agents.**

1. Please refer to written reports provided which summarize statements if any.
2. No grand jury testimony by the defendant.

3. Any video or audio recorded statements were or will be provided to defense counsel.

**B. Defendant's prior record.**

The government has no information about the defendant's prior criminal record additional to what has already been provided and what was contained in the Pretrial Services Report.

**C. Documents and tangible objects.**

Prior to trial and at the convenience of defense counsel the government will permit inspection, copying and photographing of the items listed in Rule 16(a)(1)(E), documents and tangible objects. For purposes of expediency, the government has provided documents and tangible objects to defense counsel via Flashdrive described as follows:

Name
Dashawn Dumas
Jayland Ware
Larry Reynolds
Lorenzo Nettles
Marcus Winn
Misc
Mohamed Mohamed
Mohamed phone dump 1
Nathaniel Sturdivant

**D. Reports of examinations and tests.**

Prior to trial and at the convenience of defense counsel the government will permit inspection, copying and photographing of the items listed in Rule 16(a)(1)(F), reports of examinations and tests, if they exist in this case.

The government reserves the right to supplement additional discovery as received.

## **II. Exculpatory Evidence.**

The government is mindful of its obligations under Brady v. Maryland, 373 U.S. 83 (1963); United States v. Agurs, 427 U.S. 97 (1977); and Giglio v. United States, 405 U.S. 150 (1972). To the extent such information exists, the government will divulge to counsel at or shortly before the time of trial all promises or inducements offered to government witnesses, any plea agreements entered into therewith, the prior conviction of all such witnesses, any financial consideration provided thereto, and all other impeachment material subject to disclosure under the foregoing authorities.

## **III. Demand for Discovery**

The government hereby makes a request for reciprocal discovery, pursuant to Rule 16(b)(1)(A) and (B) of the Federal Rules of Criminal Procedure, to inspect and copy any books, papers, documents, photographs, tangible objects, and results of physical or mental examinations or scientific tests or experiments, which are in the possession, custody or control of the defendant, or with the exercise of due diligence can be obtained by the defendant, and which the defendant intends to introduce as evidence at his forthcoming trial. In addition, pursuant to Rule 12.1(a)(1), the United States hereby requests in writing a notification of any intended alibi defense.

Respectfully submitted,

**REBECCA C. LUTZKO**  
**United States Attorney**

By: /s/ Joseph P. Dangelo  
**JOSEPH P. DANGELO (#0079898)**  
Assistant United States Attorney  
Northern District of Ohio, Akron Branch  
Seiberling Federal Courthouse  
Two South Main Street  
Akron, Ohio 44308

Direct: 330-761-0530  
[Josesph.Dangelo@usdoj.gov](mailto:Josesph.Dangelo@usdoj.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 27<sup>th</sup> day of September, 2023, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Joseph P. Dangelo  
**JOSEPH P. DANGELO (#0079898)**  
Assistant U.S. Attorney